

In support of this application I offer the following required information.

1. Applicant Identification
 Gardner Redevelopment Authority
 Gardner City Hall- Manca Annex
 115 Pleasant Street, Room 201
 Gardner, Ma 01440
2. Funding Requested
 - a. Grant Type : Cleanup FY 19 Cleanup Grant (EPA-OLEM-OBLR-18-07)
 - b. Requested amount \$200,000.00
 - c. Contamination Indicate "Petroleum Contamination"
3. Gardner, Worcester County, Commonwealth of Massachusetts
4. Contacts:
 - a. Project Director
 Maribel Cruz
 Economic Development Coordinator
 Dept. Of Community Development & Planning
 115 Pleasant Street, Room 202
 Gardner, Ma 01440
 Tel (978) 630-4074
 Fax (978)632-1905
 Email: mcruz@gardner-ma.gov
 - b. Chief Executive
 Trevor Beauregard
 Executive Director
 Gardner Redevelopment Authority
 115 Pleasant Street, Room 201
 Gardner, Ma 01440
 Tel: (978) 630-4011
 Fax: (978) 632-1905
 Email: tbeauregard@gardner-ma.gov
5. Population: U.S. Census as of July 1, 2017 = 20,640
6. Other Factors Checklist: The priority site is adjacent to a body of water.

 The proposed site(s) is adjacent to a body of water (i.e., the border of the site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).
7. Acknowledgement Letter from the State Department of Environmental Protection and State Petroleum Eligibility Determination letter.



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

One Winter Street Boston, MA 02108 • 617-292-5500

Charles D. Baker
Governor

Karyn E. Polito
Lieutenant Governor

Matthew A. Beaton
Secretary

Martin Suuberg
Commissioner

December 13, 2018

U.S. EPA New England
Attn: Frank Gardner
5 Post Office Square, Suite 100
Mail Code: OSRR07-3
Boston, MA 02109-3912

RE: STATE LETTER OF ACKNOWLEDGMENT
Gardner Redevelopment Authority, Application for EPA Cleanup Grant Funds

Dear Mr. Gardner:

I am writing to support the proposal submitted by the Gardner Redevelopment Authority (GRA) under the Fiscal Year 2019 U.S. Environmental Protection Agency (EPA) Brownfield Cleanup Grant Program. The GRA is seeking funding to conduct further cleanup of the property located at 140 South Main Street in Gardner, Massachusetts. The GRA and the City of Gardner have a history of successfully redeveloping Brownfields sites following assessment, including the locations of a recent project relative to the new Gardner Police Department (200 Main Street) and the earlier phase of petroleum cleanup recently concluded at 140 South Main Street, which is a former oil distributor. The City's ongoing efforts to remediate this contaminated property will be greatly strengthened through funding from EPA.

In Massachusetts, state and federal agencies have developed strong partnerships and work together to ensure that parties undertaking Brownfield projects have access to available incentives. The Massachusetts Department of Environmental Protection (MassDEP), through our regional offices, provides technical support to Brownfield project proponents when regulatory issues arise. If this proposal is selected, MassDEP will work with our state and federal partners to provide the support to GRA that will be needed to help make this project a success.

We greatly appreciate EPA's continued support of Brownfield efforts here in Massachusetts.

Sincerely,

Paul Locke
Assistant Commissioner, Bureau of Waste Site Cleanup

cc: Trevor Beauregard, Executive Director, Gardner Redevelopment Authority
Maribel Cruz, Economic Development Coordinator, Gardner Redevelopment Authority
Mike LeBlanc, Brownfields Coordinator, MassDEP Central Regional Office

This information is available in alternate format. Call Michelle Waters-Ekanem, Diversity Director, at 617-292-5751. TTY# MassRelay Service 1-800-439-2370

MassDEP Website: www.mass.gov/dep

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1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

i. Target Area and Brownfields

ii. Background and description of Target Area: Established as a town in 1785, in North Central Massachusetts, Gardner was later incorporated as a city in 1923. By the mid-1800's, Gardner was home to twelve furniture manufacturing facilities producing over 1.2 million chairs annually. By 1910, Gardner had witnessed a surge in manufacturing with twenty major chair manufacturers producing over 4 million chairs each year and earning Gardner international recognition and the first reference to Gardner as the "Chair City of the World"; now, simply The Chair City. During this growth, the manufacturing industry matured through the increase of sites focused on the furniture industry. These industrial sites were often located in neighborhoods within very close proximity to residences. Many of these sites produced materials, finished products or supported furniture making as machine and tool shops. This siting was intentional to satisfy the need for numerous employees, in reaction to historic lack of transportation and as a result of the city's failure to adopt a zoning ordinance prior to 1971. During the past fifty years, these manufacturing firms have closed or relocated. The decline of this industrial period has left Gardner a legacy of vacant, underutilized facilities that are not conducive to modern manufacturing. The exodus of manufacturing has resulted from the nationwide shift in labor. Taxation, increased costs in energy and labor and changes in regional priorities in the northeastern United States has left the City with numerous contaminated sites surrounded by residential neighborhoods. The last remaining major furniture manufacturer, Nichols & Stone, Inc., filed for bankruptcy in 2007 and closed, ending a 200-year period of furniture manufacturing in the City. The blight caused by our former industrial mill sites has been especially acute and continues to have a significant impact on the city's community life, while creating a barrier to economic development and posing a threat to human health and the environment due to high cost of assessment and remediation. Through public forum and discussion the City identified the urgent need to assess and redevelop these blighted areas. This resulted in the creation of two Urban Renewal Areas including the Mill Street Corridor (MSC), known as the Mill Street Urban Renewal Plan (MSURP). This application focuses on remediation of a Brownfield site in close proximity to this corridor known by its address, 140 South Main Street.

iii. Description of the Brownfield site: From 1949 to 1980 the site hosted a livery and gas/ service station, through the 1980's it housed the Bolster Oil Company and in the 1990's was home to Mailman's Steam Carpet Cleaning. From the early 2000's to 2009 it was occupied by an auto repair business. Bolster reportedly distributed fuel oil, gasoline, kerosene and lubricating oil. In 1986 11 underground storage tanks and an undisclosed number of aboveground storage tanks were removed from the site. The Site is contaminated by Petroleum substances. In general, the site buildings have concrete slab floors with floor drains that flow to the river. In the front forecourt of the site was a fuel dispenser island as well as elevated above ground storage tanks that were utilized for fuel dispensation. The site is bounded by residential properties to the north and west, a river to the south, and South Main Street to the east. Prior to remediation work performed following a July 2014 Release Abatement Measure (RAM) plan the garage to the south of the property and a hydraulic lift were demolished and removed. Under the RAM plan, 900 tons of petroleum-impacted soil was removed. Monitoring wells installed in 2016 have shown continued elevated petroleum levels in groundwater. A simple visual inspection of the surrounding body of water shows the presence of contamination. The remaining presence of a retaining wall along Greenwood Brook is also a concern to the potential re-use of the site and its

effects on soil remediation surrounding the structure. Environmental concerns focus on the soil and water impacts to future use of the site as well as health and habitat issues for humans and wildlife that come into contact with the contamination. The property is currently improved by two single-story buildings consisting of multi-room office area with attached garage. A separate garage on the southern portion of the site, i.e. closer to Greenwood Brook was demolished in an earlier phase of remediation. A 13 ft. high retaining wall is located along the southern/eastern boundary of the site, separating the site from Greenwood Brook. The remainder of the site is open vegetated land. Wetlands associated with Greenwood Brook and designated 100-year floodplain areas are located within 500 feet of the site. This brook feeds into the Otter River Watershed which in turn feeds the Millers River and ultimately Connecticut waterways. There is a 2 family home that directly abuts the property on the west side. There is also a single family home that abuts the property on the north side of the property.

a. Revitalization of the Target Area

- i. Overall Plan for Revitalization Since taking ownership of the site in 2012 the GRA has been approached by multiple local prospects interested in making commercial use of the site. A completed and thorough remediation of contamination would ensure optimal use of the site while improving habitat for Greenwood Brook and the waterways downstream that flow into the Otter River. Occupation of the site by a successful small business will immediately reduce health and safety risks to the abutters and to the South Gardner Neighborhood. Current prospects have the potential to sustain 3-10 jobs including the entrepreneur starting the enterprise. This remediation project and the other private improvements being made in South Gardner, coupled with work being done within the Mill Street Corridor (Urban renewal zone) immediately to the southwest will dramatically improve access to employment while reducing or eliminating exposure to harmful contamination. Improving the embankment of Greenwood Brook and ensuring no further petroleum contamination effects the waterway will create more attractive siting for South Gardner while reducing pollution entering the Otter River/Millers River/Connecticut River waterways downstream that affect a significant population of people and wildlife.
- ii. Outcomes and Benefits of Overall Plan for Revitalization: According to the 2010 US Census, the City's housing inventory consists of nearly 60% of properties falling below \$200,000 in value. This contrasts to the State's level of 16% within the same value criteria. It can be credibly stated that the City's property assessments may be lower in part due to the presence of substandard brownfield sites. Many of these sites are vacant or underutilized. They allow for a variety of safety risks and numerous other negative issues. The City continues to invest considerable monetary and personnel resources to maintain the safety of the neighborhoods surrounding these properties with a significant impact to the Building and Public Safety Departments. Many nearby residents have become disinvested and have failed to provide upkeep and maintenance of their properties. Each of these characteristics have contributed to the negative impact these sites have on property value, job availability, city resources, the tax base and the City's capacity for remediation and cleanup. The City's unemployment rate (6.3%) is significantly higher than County (4.7%), and State (4.5%) rates. The local unemployment

rate has a direct effect on the lack of available employment due to so many areas being underdeveloped because they need remediation. With funding to clean up these sites an increase in commercial construction and employment options will boost local economic growth.

b. Strategy for Leveraging Resources

- i. Resources Needed for Site Reuse: The Gardner Redevelopment Authority will apply for funds through organizations listed below. The following is also a list of past performance in acquiring funding for projects.
 - **MassWorks:** In October of 2015, the City of Gardner was awarded a **\$2 million MassWorks** grant for the remediation and redevelopment of the former Garbose Metal facility, located in the Mill Street Urban Renewal Area. The funds were committed to the soil removal, cleanup and restoration of the Greenwood Brook. Including associated wetland areas, and disposition associated with the remediation. \$1.2 million was also granted from the MassWorks Infrastructure program grant for the Rear Main Street Corridor Redevelopment project.
 - **3 EPA Cleanup Grants:** The Gardner Redevelopment Authority was awarded 3 cooperative agreements for \$200,000 each. A total of \$600,000 in October 2016. The funds were dedicated to 3 parcels of land within the former Garbose Metal Facility. These parcels had been contaminated with petroleum and hazardous waste. Funding was used to conduct further assessment, cleanup, and remediation activities as well as to begin the submittal process associated with the remediation project. The site is located within the Mill Street Corridor MSC Urban Renewal Area and will require additional reporting for successful remediation.
 - **Department of Housing and Urban Development (HUD):** As a mini-entitlement community through the state Community Development Block Grant (CDBG) Program, the City received HUD funds in 2016 in the amount of \$825k. The CDBG funds have been used for demolition and remediation activities in the Mill Street Corridor.
 - The City had a **\$1,250,000 million EPA Brownfield Revolving Loan Fund (BRLF)** to partner with private and public investment to bring sites into environmental compliance following assessments. As of this application, the RLF has issued a \$200,000 loan to remediate the property that became the location of the new Gardner Police Department as well as a \$158,500 sub grant to aid in the remediation of 140 South Main Street.
 - The City has means of providing additional funding and resources for projects as described below:
 - The Gardner Redevelopment Authority has applied for MassDevelopment Special Funds Grant in the amount of \$350,000 determination on the grant will be in the early spring of 2019.
- ii. **Use of Existing infrastructure:** The site is located in a mix use commercial / residential zone, with the zoning in place the GRA has had many prospective interests in purchasing the property. Taking advantage of all the utilities and infrastructure already in place. (power supply, road, bridge, railway access) This grant will facilitate the use of existing infrastructure within the target area as the solution remains to focus efforts to remediate and redevelop this unproductive site, for small business opportunities.

c. **COMMUNITY NEED AND COMMUNITY ENGAGEMENT**

- A. **Community Need: The Community's need for funding:** Based on the 2010 Census, Gardner is a smaller city within the Commonwealth of Massachusetts. This restricts the City in generating revenue and in eligibility for certain funding sources. The City does not have the ability to increase funding, or offset additional costs via its declining residential tax base. The statistics relative to unemployment, poverty, and median household income further highlight a community in dire need of funding assistance to promote economic development through brownfields remediation and redevelopment. As of November 2017 Gardner has a total of 424 residential foreclosures since 2011, an average of 70 foreclosures per year. Over recent years, the City has seen drastic cuts in State aid for municipal services and education, resulting in a reduction in personnel, consolidation of departments, and reduced hours at City Hall. The City combined its Recreation Department with its Department of Public Works, eliminating a department head position to save costs. Each of these issues hinders the City's efforts to raise the necessary resources to address local brownfield issues.

Since 2008, the City has witnessed significant economic disruption due to plant closures and natural disasters. A manufacturer of guns and rifles, H&R 1871, Inc., moved its manufacturing operation out of Gardner. The result of this move was the elimination of 202 permanent, local, full-time positions. The closure of furniture maker Nichols & Stone in 2008 ended a three year period that saw job losses totaling 350. Their closure capped a 151 year operative legacy for the company. In December 2008 the City felt the direct impact of a significant ice storm. Many residential and commercial locations lost power for ten to fourteen days or more. There was an acute adverse impact on the City's economy as a result of this natural disaster. For some small businesses, this was a final blow to their viability. Most recently the Tops Market facility closed as of December 31st 2017, leaving 77 local employees without work for the New Year. Due to these setbacks, the City continues to struggle to move forward.

According to the 2010 US Census, the City's housing inventory consists of nearly 60% of properties falling below \$200,000 in value. This contrasts to the State's level of 16% within the same value criteria. It can be credibly stated that the City's property assessments may be lower in part due to the presence of substandard brownfield sites. Many of these sites are vacant or underutilized. They allow for a variety of safety risks and numerous other negative issues. The City continues to invest considerable monetary and personnel resources to maintain the safety of the neighborhoods surrounding these properties with a significant impact to the Building and Public Safety Departments. Many nearby residents have become disinvested and have failed to provide upkeep and maintenance of their properties. Each of these characteristics have contributed to the negative impact these sites have on property value, job availability, city resources, the tax base and the City's capacity for remediation and cleanup. The City's unemployment rate of (6.3%) is significantly higher than County (4.7%), and State (4.5%) rates. The local unemployment rate has a direct effect on the lack of available employment due to so many areas being underdeveloped because they need remediation. With funding to clean up these sites an increase in commercial construction and employment options will boost local economic growth.

Threat's to sensitive populations Health or welfare of Sensitive Populations: Based on the data within the comprehensive Community Health Assessment, Gardner has significantly higher

incidents of poor health, mental illness and mortality compared with the Commonwealth of Massachusetts. Mortality rates in many categories are much higher than state averages. The Premature Mortality Rate is 42% higher than the Massachusetts average. The death rate associated with cancer is 23% higher with lung cancer (49%) and breast cancer (30%) death rates significantly higher than the state average. The coronary heart disease mortality rate, per 100,000 people, is 47% higher. Of greatest concern is that many of these numbers have risen since the last reporting, in 2011, including the Premature Mortality Rate and the Cancer Death rate. Research has shown that these statistics traditionally reflect the social characteristics of long term exposure to vacant and underutilized industrial properties. The assessment of these demographics within the older industrial community, where residential homes and industrial sites are comingled with neighborhoods presents linkages to environmental justice issues. These health issues provide a multitude of impacts including increased hospitalizations, decreased employee production, and an acute negative impact on education. Cleanup of 140 South Main Street presents a significant opportunity for the City of Gardner to improve quality of life and economic opportunity while preserving the environment for future generations.

Greater than normal incidence of disease and adverse health conditions: The 140 South Main Street property is located in a mixed-use neighborhood with a higher than State and City average of poor and economically distressed persons. The existence of abandoned industrial Brownfields in this neighborhood has resulted in a potentially elevated threat to human health. The site also borders Greenwood Brook which is a stream that runs through the entire length of the property. The site is also abutting residential homes. The presence of the stream and wetlands next to a Brownfields site increases the potential for contamination to be carried downstream and/or to affect area wildlife. The remediation of the site will improve any environmental injustices that have occurred and will lead to job creation and/or housing. These improvements will significantly improve the quality of life for residents of the surrounding neighborhoods. Throughout its Brownfields program the City of Gardner has worked in conjunction with the City's Board of Health. Consultation with this department was used in developing the Brownfields site inventory and prioritization process. A thorough review of threats to human health and the environment was conducted in conjunction with this process. The Gardner Board of Health has been involved in the Brownfield's Assessment Grant Steering Committee and continues to be a stakeholder in the process. The cleanup and redevelopment of the site is intended to be a likely catalyst for overall neighborhood redevelopment efforts that will result in safer housing and reduced exposures to hazardous materials which threaten adults and children alike.

Economically impoverished/disproportionately Impacted Populations: The economic impact of so many lost jobs has led to a lack of municipal resources for public programs, most notably transportation, infrastructure and education. Gardner suffers from a lack of opportunity for living-wage jobs within city borders. Many professionals have left, many who stay commute daily out of area for work. This has had an impact on public health and civic participation. South Gardner plays host to a proliferation of unproductive storefronts and other parcels including this Brownfield site. South Gardner is further hampered economically as it sits just outside of easy walking distance from the center of the City, bisected by State Route 2, a four lane divided east/west highway. The relative lack of public transportation has exacerbated this issue. From a

safety perspective 140 S. Main Street presents an acute issue. Though under GRA control it remains a burden on law enforcement and poses a potential hazard, if children or other parties desire to misuse the site and expose themselves to petroleum contamination. The solution remains to focus efforts to remediate and redevelop unproductive portions of South Gardner, including this site, for small business opportunities.

Community Engagement:

i. Community Involvement

NewVue Communities, Marc Dohan, mdohan@nvcomm.org, 978-400-0160: NewVue Communities is a local non-profit agency located in Gardner that promotes self-sufficiency by creating affordable housing opportunities and providing additional programs that raise the economic, educational, and social levels of residents in its service area. NewVue Communities continues to commit to the City's program by identifying opportunities of redevelopment and proposed locations for assessment and remediation.

Greater Gardner Chamber of Commerce: Carol Jacobson, cjacobson@gardnerma.com, 978-632-1780 The local Chamber of Commerce is a business advocacy organization with strong ties to local development and the real estate industry. The Chamber commits to assisting the City in marketing development efforts to members and potential stakeholders while providing key links to the business community for program participation and potential reuse of industrial, brownfield, and commercial sites.

Montachusett Regional Planning Commission: John Hume, jhume@mrpc.org, 978-345-7376 ext. 302 MRPC is the principal author of the federal Economic Development Administration (EDA) funded Montachusett Regional Comprehensive Economic Development Strategy (CEDS) that promotes and enhances economic development and job creation and targets strategic economic development projects throughout the region. The cleanup up of 140 South Main Street project will provide substantial economic benefit to the City of Gardner and fits well with the goals of the region's CEDS document. The CEDS identifies the 140 South Main Street project as a high priority area within the region that is targeted for master planning, remediation and redevelopment activities.

- iii. **Incorporation Community Input:** Through the Gardner Brownfields Steering Committee (BSC) the City has a formal outreach program to promote and discuss 140 South Main Street site cleanup and reuse planning. The effort, in cooperation with local community partners, includes an educational component to keep local businesses and residents better informed about the site and impacts of brownfields in general. This outreach is to include information dissemination via the City's Economic Development brownfields website; the development of regular press releases describing current and upcoming activity; distribution of informational pamphlets to the public through community partners; and speaking engagements in public settings, in social events, and through necessary public hearings. This will keep channels of communication open between residents in affected areas and the Program Manager (PM) and Brownfield Steering Committee (BSC) and is consistent with the process that has continued through the pre-remediation process. Personnel: PM to develop outreach materials, website content, and conduct outreach through partner agencies and public workshops.

d. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. **Proposed Cleanup Plan:** The proposed draft for cleanup activities includes the removal of the retaining wall/former garage foundation, to conduct additional contaminated soil excavation at depths near and below groundwater table (specifically nearer to and up to the bank of Greenwood Brook) for off-site disposal. Additional action will include the removal of LNAPL in groundwater and to complete the restoration of the riverbank. Included within this activity will be the personnel needed for reporting and project update. To pursue regulatory closure without added restrictions on the property (no Activity and Use Limitation), the measurable LNAPL in on-site wells must be eliminated. Approaches to LNAPL removal at this site would include additional soil excavation in the area of the retaining wall. Since the retaining wall is no longer considered a load bearing, functional retaining wall, sections of the wall will be removed to allow for soil excavation and the area could be restored by grading the site down towards Greenwood Brook. During this proposed option, LNAPL will be pumped out during the dewatering of the excavation area, and the free-phased product will also be disposed off-site. Also during this proposed option, the residual petroleum impacted soil along the Greenwood Brook bank will also be excavated as necessary.

b. **Description of tasks and Activities:** Elimination of all measurable LNAPL in on-site wells. Complete additional soil excavation in the area of the retaining wall to eliminate soil contamination. Remove sections of the wall to allow soil excavation and restore the embankment to habitat by grading down towards the waterline. Ensure that all soils contaminated on site are excavated and disposed of off-site. The successful redevelopment of 140 South Main Street as small business. An increase in entrepreneurial interest in the South Gardner Neighborhood. An increase to small business employment in the South Gardner Neighborhood. The successful use of habitat by wildlife along Greenwood Brook. The elimination of public health, safety and environmental issues stemming from the site. The project will be measured through analysis by the LSP, PM/EDC, other relevant municipal staff with final approval and input by the GRA board and additional oversight by MADEP and EPA. All information collected as part of analysis will be carefully weighed for efficacy and archived for easy reference.

c. Cost Estimates and Outputs: IV.E.3.c Cost Estimates and Outputs (10 pts.)

Budget Categories		Project Tasks (\$) [programmatic costs only]						
		Task 1	Task 2	Task 3	Task 4	Task 5	Task 6	Total
Direct Costs	Personnel							3,600
	Fringe Benefits							0
	Travel ¹							0
	Equipment ²							0
	Supplies							500.00
	Contractual							195,900
	Other (specify) _____							0

Total Direct Costs ³	0	0	0	0	0	0	0
Indirect Costs ³							0
Total Federal Funding (Not to exceed \$500,000)	0	0	0	0	0	0	200,000
Cost Share (20% of requested federal funds) ⁴							40,000
Total Budget (Total Direct Costs + Indirect Costs + Cost Share)	0	0	0	0	0	0	240,000

Measuring Environmental Results:

- e. Project Outputs: Completion of remediation for site to include
- 1.) Pursue regulatory closure without added restrictions on the property (no activity or use limitations).
 - 2.) Elimination of all measurable LNAPL in on-site wells.
 - 3.) Complete additional soil excavation in the area of the retaining wall to eliminate soil contamination.
 - 4.) Remove sections of the wall to allow soil excavation and restore the embankment to habitat by grading down towards the waterline.
 - 5.) Ensure that all soils contaminated on site are excavated and disposed of off-site.

Project Outcomes:

- 1.) The successful redevelopment of 140 South Main Street as small business.
- 2.) An increase in entrepreneurial interest in the South Gardner Neighborhood.
- 3.) An increase to small business employment in the South Gardner Neighborhood.
- 4.) The successful use of habitat by wildlife along Greenwood Brook.
- 5.) The elimination of public health, safety and environmental issues stemming from the site.

The project will be measured through analysis by the LSP, PM/EDC, other relevant municipal staff, with final approval and input by the GRA board and additional oversight by MADEP and EPA. All information collected as part of analysis will be carefully weighed for efficacy and archived for easy reference

- PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE a. Programmatic Capability
Organizational Structure:
- **Trevor Beauregard** serves as the Director of the DCDP and brings over twenty two years of economic and community development, as well as grants management, experience to the city. Mr. Beauregard provides final approval on all payments and monitors the Economic Development Coordinator (EDC) and other department personnel for compliance with programmatic requirements. Under the general direction of Mr. Beauregard, the EDC will implement and administer all funded activities relative to the project.
- **Maribel Cruz**, EDC for the City will act as the PM for the cleanup project. Ms. Cruz brings over 18 years of Business Banking Management experience. She has a proven track record for program development, business development and strategic planning to facilitate growth. Approximately ten percent of her time is to be spent managing the program, conducting outreach, marketing, steering committee coordination and oversight, prescreening of grant applications, contract oversight, and submittal of program reports.
- **Katie Medina**, Budget/Project Manager, has over seven years of experience with public/private sector financial management. Her duties require her to stay current on

financial requirements of the various programs and ensure that payments are made properly and on time. She will work closely with the PM to ensure that project implementation is compliant with current programmatic and financial requirements along with monitoring the expenditure of grant funds through grant programs and submitting weekly reports to the PM.

- i. **LSP Contractor (Contractual Personnel)** is used for technical assistance related to site assessment and remediation activities and for review of program participant applications, conducting Phase I, II, and III ESA's and cleanup planning, monitor and report on progress, and offer technical reports for quarterly submissions to EPA and regular updates to the ACRES reporting system. The LSP acts as compliance monitor for the City to assure compliance with the Massachusetts Contingency Plan (MCP). The City of Gardner has two LSP's under contract, one of these LSP's will be used for contract oversight.

Acquiring Additional Resources: The City's Department of Community Development and Planning (DCDP) has successfully administered grant programs from a variety of State and Federal sources. Since 1994, the DCDP has managed over \$23 million in grant funds, including over \$1.9 million in brownfield funding. The City has successfully managed \$1.25 million in revolving loan funds, \$800,000 of Brownfield Cleanup funds, and \$370,000 in assessment funds through local, state, and federal programs. The City has two contractual agreements with Licensed Site Professionals (LSP) to provide technical assistance to all cleanup planning activities. City personnel, along with its contractual and community partners, have the diverse experience to successfully establish, market, and manage brownfield site assessments and determine the worthiness of potential projects.

Past Performance and Accomplishments: The GRA has historically remained in a successful, productive partnership with the EPA including grants awarded and administered outside and prior to the cleanup grant, as the recipient of grants that have provided crucial aid in offsetting costs relative to environmental remediation at various sites within the city, with over 100 documented brownfields sites within our geographic borders the aid of the EPA in consultation as well as funding has been beneficially impactful, as the city continues to create jobs, and housing, increased tax revenues and eliminate blight as it has successfully done in the recent past. As noted, past EPA funding has been used for assessment and cleanup prior to 2007, with five total sites being affected and improved by these monies. The City provided a Hazardous Material Loan, in the amount of \$200,000, that assisted in the remediation at the site of the City's new Police Station. In 2016 the GRA received \$340,750 from the GBRLF sub grant for the Garbose remediation. The 3 EPA Cleanup grants were granted in 2016 for three parcels on the former Garbose Metal Facility, 200k per parcel with a total of \$600,000. The Garbose property is in the final reporting stages for successful remediation. Additionally, a \$158,500 Petroleum Grant was approved to assist in the earlier remediation of 140 South Main Street with a significant amount of contamination flowing southward along the waterway. Utilizing EPA funds Activities for 140 South Main Street included removal of grossly impacted soils in the vicinity of the garage. In 2014 the contractor conducted the work under the Release Abatement Measure (RAM) Plan, which included excavation, management and off-site recycling of approximately 900 tons of impacted soil following the demolition of the garage building. The

contractor also removed a hydraulic lift from a separate building and excavated impacted soils. Following site remediation excavation areas were backfilled with clean fill and graded.

IV.F. Leveraging: Currently, the City is managing a \$1.25 million EPA RLF Grant for city-wide cleanup projects. The GBRLF is being marketed to eligible public and private sector entities, for brownfield loans and/or grants, having provided one loan (\$200,000) relative to the City's new Police Station site and one grant (\$158,500) for a Petroleum site cleanup. The City has made sufficient progress, in relation to the approved work plan, schedule, and terms and conditions with regards to the GBRLF. All awarded grants have been reporting in a timely fashion.

**DRAFT Analysis of Brownfields Cleanup Alternatives – Preliminary
Evaluation
Former Bolster Oil Company
140 South Main Street, Gardner, Massachusetts
MassDEP Release Tracking Number: 2-00729**

**Prepared for the City of
Gardner October 2018**

I. Introduction & Background:

- a. **Site Description: 140 South Main Street Gardner, Ma. 01440** The Site consists of a 0.22 acres of land off South Main Street (to the east) that is abutted by Greenwood Brook to the south. A residential property off Travers Street abuts the site to the west. The property is currently improved by two single-story buildings consisting of multi-room office area with attached garage. A separate garage on the southern portion of the site (i.e., nearer to Greenwood Brook) was recently demolished. An approximate 13-foot high retaining wall is located along the southern/eastern boundary of the site, separating the site from Greenwood Brook. The remainder of the site is open and paved with asphalt.

The site is not located within a Potentially Productive Aquifer, Sole Source Aquifer, Federal Emergency Management Agency (FEMA) 100-year floodplain, Zone II Area, Interim Wellhead Protection Area, Surface Water Supply Zone A, Area of Critical Environmental Concern, Vernal Pool, or Habitat of Rare Wetland Wildlife. In addition, there are no public or private drinking water supply wells within a 500-foot radius of the property. Wetlands associated with Greenwood Brook, and designated 100-year floodplain areas are located within 500 feet of the Site.

- b. **Previous Site Use(s):** According to previous reports, the site was occupied by a livery company from circa 1900 to 1921, and the site may have been used for residential purposes from 1921 until early 1930s. From the 1930s to the 1980s, the Bolster Oil Company (Bolster) occupied the site. Bolster reportedly distributed petroleum products including gasoline, fuel oil, kerosene, and lubricating oil, and used the property for automotive repair and servicing. In 1986, eleven (11) underground storage tanks (USTs) and an undisclosed number of above ground storage tanks (ASTs) associated with Bolster were removed from the site. Mailman's Steam Cleaning reportedly operated at the site from early 1990 until the mid to late 1990s, and they used the property as office and storage space for equipment only. The site was reportedly occupied by an automotive repair garage from the early 2000s until 2010.

- c. **Site Assessment findings:** Under the Massachusetts Contingency Plan (MCP) regulations, three Release Tracking Numbers (RTNs) have been assigned to site. According to previous site reports, RTNs 2-0729 and 2-11463 are associated with petroleum-impacted soils discovered during a Phase I Environmental Site Assessment in 1990 and a utility repair in 1996, respectively. RTN 2-18421 was also issued to the site in 2011 after MassDEP conducted investigations at the abandoned site. MassDEP discovered light non-aqueous phase liquid (LNAPL – primarily No. 2 fuel oil) in several groundwater monitoring wells on the site, and observed LNAPL seeping from the site’s retaining wall and building support wall adjacent Greenwood Brook. Booms and absorbent socks were installed to mitigate the effects of this release, and in 2012 MassDEP listed RTN 2-18421 as being addressed (i.e., linked) under the site’s primary RTN 2-0729.
- In February 2013, another environmental consultant prepared an *Analysis of Brownfield Cleanup Alternatives (ABCA) and Phase III - Remedial Action Plan* for the site, supported by a sub-grant to the GRA provided through the City’s Brownfields Revolving Loan Fund (RLF). Following that work, that consultant submitted a MCP Release Abatement Measure (RAM) Plan to MassDEP under site RTN 2-0729 in July 2014. Prior to conducting the RAM work, the garage building on the southern portion of the site was demolished. Under the RAM Plan, a former hydraulic lift in the remaining building garage area was removed, and contaminated soil was excavated beneath this former lift area to approximately 10 feet below grade. A total of 5 cubic yards of contaminated soils was generated for off-site disposal during this work. Contaminated soil excavation also occurred on the exterior portion of the site in the area of the recently demolished garage, to the north of the retaining wall. This excavation occurred to approximately 14 feet below grade, and approximately 900 tons of contaminated soils were generated from this excavation work for off-site disposal. During this RAM work, contaminated soil excavation did not occur below the groundwater table, and the groundwater/LNAPL issue was not treated. A RAM completion report was filed for RTN 2-0729 in May 2015. Post-RAM Site Assessment Findings: Post-excavation confirmatory soil sampling indicated that elevated concentrations of petroleum-related compounds remain in a base (bottom) sample collected from the former hydraulic lift excavation area, and in five of the confirmatory samples collected from the larger excavation area. The confirmatory sample with the highest concentrations was collected along the bottom of the excavation near retaining wall. Gauging of LNAPL in groundwater did not occur as part of RAM (monitoring wells need to be replaced), but it is assumed that LNAPL is still present because groundwater treatment did not occur.
- d. **Project Goal:** The project goal is to remove the retaining wall/former garage building foundation, conduct additional contaminated soil excavation at depths near and below the groundwater table (specifically nearer to and up to the bank of Greenwood Brook) for off-site disposal. Remove the LNAPL in groundwater issues, and complete bank restoration. These actions should further reduce or eliminate LNAPL seepage into the abutting resource area (i.e., brook). Following site remediation, the City plans to market the property for mixed commercial reuse.

II. Applicable Regulations and Cleanup Standards:

- a. **Cleanup Oversight Responsibility:** As the current owner, GRA is the “Responsibility Party” for addressing cleanup for site RTN 2-0729. The City’s environmental consultant / Licensed Site Professional (LSP; a hazardous waste site cleanup professional in Massachusetts) for the project will be responsible cleanup oversight and reporting to MassDEP on behalf of GRA in accordance with the MCP.
- b. **Cleanup Standards for major contaminants:** The MCP describes two basic approaches (a constituent- specific approach and a cumulative risk approach) and three methods (Method 1, Method 2, and Method 3) for evaluation of risk. In a Method 1 Risk Characterization, soil and groundwater exposure point concentrations are compared to applicable Method 1 Cleanup Standards. A Method 2 Risk Characterization supplements and modifies the MCP Method 1 standards with site and constituent-specific information. Method 2 can be used to modify existing Method 1 Standards and/or to derive additional standards for those constituents for which Method 1 standards have not been promulgated and can also account for site-specific fate and transport mechanisms. A Method 3 Risk Characterization is a cumulative, site-specific risk approach that includes assessment of the impacts to identified human and ecological receptors, as well as characterizing the risk of harm to safety and public welfare. This method is used when environmental media (e.g., sediment, surface water) other than, or in addition to soil and groundwater have been identified as media of concern due to contamination by a release.
- c. **Laws & Regulations Applicable to the Cleanup:** Laws and regulations that are applicable to this cleanup project include the MCP for site release RTN 2-0729, the Federal Davis-Bacon Act, and wetlands permitting under Massachusetts Wetlands Protection Act (310 CMR 10.00). Federal, state, and local laws regarding procurement of contractors to conduct the cleanup will be followed. In addition, all appropriate permits (e.g., notify before you dig, soil transport/disposal manifests) will be obtained prior to the work commencing.

III. Evaluation of Cleanup Alternatives:

- a. **Cleanup Alternatives Considered:** To address contamination at the Site, three different alternatives were considered, including Alternative #1: No Action and/or Monitored Natural Attenuation (MNA) Alternative #2: Excavation with Offsite Disposal; and Alternative #3: In-Situ Remediation.
- b. **Cost Estimate of Cleanup Alternatives:** To satisfy MCP requirements, the effectiveness, implementation, and cost of each alternative must be considered prior to selecting a recommended cleanup alternative.

Effectiveness: Alternative #1: Although a significant volume of the petroleum “source” soils were previously excavated and disposed off-site, there is still a LNAPL in groundwater issue that is/has migrated toward the abutting brook, which presents unacceptable levels of risks to the environment at the site.

Therefore, this option alone cannot be evaluated in detail. Alternative #2: Excavation with off-site disposal is an effective way to eliminate risk at the site, since contamination will be removed and the exposure pathways will no longer

exist. In addition, dewatering will need to occur as part of contaminated soil excavation work below the groundwater table, which will allow for treatment of groundwater and off-site disposal of separate phase petroleum product.

Furthermore, the demolition/removal of the retaining wall in areas not structurally connected to abutting properties will allow for further access to the deeper contaminated soils and better access to the contaminated soils outside of the wall, adjacent to/along the brook bank. Alternative #3: In-situ treatment of soils and groundwater impacted by petroleum compounds can be an efficient/cost effective and less intrusive approach for site cleanup. However, it is typically not effective for use on LNAPL (it is more applicable for dissolved-phase petroleum impacts in groundwater), and in-situ injections of remedial additives may further exasperate the migration of the plume towards/into the abutting brook.

Implement ability: Both Alternatives #2 and #3 can readily be implemented at the site. However, as noted, in-situ remedial injections (Alternative #3) may further exasperate the migration of the plume towards/into the abutting brook, and therefore would only be implemented with restrictions on injection rates and monitoring requirements within the abutting brook. As noted above, the removal of the retaining wall will further enhance the implementation of Alternative #2.

Cost: For Alternative #2: The estimated costs for this alternative is between \$175,000 and \$240,000, which includes costs for project permitting, engineering design, sampling, and MCP reporting, as well as for retaining wall demolition, contaminated soils removal (with dewatering and treatment), off-site disposal of contaminated media, and slope restoration. Alternative #3: The estimated costs for this alternative are between \$50,000 and \$75,000, but as indicated, it may not adequately address the LNAPL in groundwater issue, and does not address impacts to the bank of the brook.

- c. **Recommended Cleanup Alternative:** To pursue regulatory closure without added restrictions on the property (no Activity and Use Limitation), the measurable LNAPL in on-site wells must be eliminated. Approaches to LNAPL removal at this site would include additional soil excavation in the area of the retaining wall. Since the retaining wall is no longer considered a load bearing, functional retaining wall, sections of the wall will be removed to allow for soil excavation and the area could be restored by grading the site down towards Greenwood Brook. During this proposed option, LNAPL will be pumped out during the dewatering of the excavation area, and the free-phased product will also be disposed off-site. Also during this proposed option, the residual petroleum impacted soil along the Greenwood Brook bank will also be excavated as necessary.



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

One Winter Street Boston, MA 02108 • 617-292-5500

Charles D. Baker
Governor

Karyn E. Polito
Lieutenant Governor

Matthew A. Beaton
Secretary

Martin Suuberg
Commissioner

December 13, 2018

U.S. EPA New England
Brownfields Project Officer
Attn: Chris Lombard
5 Post Office Square, Suite 100
Boston, MA 02109-3912

Subject: **STATE PETROLEUM ELIGIBILITY DETERMINATION**
140 South Main Street, Gardner, Massachusetts

Dear Ms. Lombard:

The Massachusetts Department of Environmental Protection (MassDEP) has been requested by the Gardner Redevelopment Authority (the "GRA") to make a determination as to whether the property listed above ("site" or "property") meets the definition of a Brownfield site and whether it is eligible to use U.S. Environmental Protection Agency (EPA) Brownfields Cleanup Grant funding, for which an application is being submitted under EPA's FY19 Brownfields Cleanup Grant round. The site is currently owned by the GRA, which acquired the property from the City of Gardner in 2012. The City of Gardner took ownership of the property due to tax taking prior to that. Contamination likely occurred between the 1930s and the 1980s, when the property was used for various petroleum-type businesses. GRA's intent is to remediate the property and then market it for redevelopment.

Between the 1930s and the 1980s, the site was occupied by a fuel dealer that dispensed heating oil, kerosene, gasoline, and lubricating oil; later, it was used as an automotive repair business. In 1986, eleven underground storage tanks (USTs) and several above ground storage tanks (ASTs) were removed from the property. Environmental investigations at the property have shown that petroleum-impacted soil and groundwater, as well as an area near the Greenwood Brook, have been impacted. These releases are documented with MassDEP under Release Tracking Numbers (RTNs) 2-0000729, 2-0011463, and 2-0018421.

After a review of available records and the information provided by GRA, MassDEP has compiled the following information:

1. Petroleum contamination is present at the site due to former uses and are documented in MassDEP records. The GRA currently owns the property. The immediate previous owner is the City of Gardner, which acquired the property via tax foreclosure, and is therefore not viable. Contamination occurred between 1930 and 1980, when neither the current owner nor

This information is available in alternate format. Contact Michelle Waters-Ekanem, Director of Diversity/Civil Rights at 617-292-5751.

TTY# MassRelay Service 1-800-439-2370

MassDEP Website: www.mass.gov/dep

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the immediate previous owner, the City of Gardner, owned the property. Therefore, both GRA and the City of Gardner are considered to be not liable.

2. The site is not currently being assessed or cleaned up using Leaking Underground Storage Tank (LUST) funds, nor is it subject to a response under the Oil Spill Act. For these reasons, the site is a "relatively low risk" site as defined by EPA.
3. The applicant (GRA) has not dispensed or disposed of, or owned the property, during the dispensing or disposal of petroleum. In addition, the applicant has not exacerbated potential contamination.
4. There are no Judgments, Orders, or Third Party Suits that identify and require a responsible party to assess, investigate, or cleanup this property.
5. This property is not subject to any order under §9003(h) of the Resource Conservation and Recovery Act (RCRA).

Therefore, based on the above information, MassDEP has determined that the property meets the requirements set forth by the EPA for a **positive petroleum eligibility determination**.

I hope that this information is helpful, and please feel free to contact Angela Gallagher at 508-946-2790 if you have any questions or concerns.

Sincerely,



Paul Locke
Assistant Commissioner, Bureau of Waste Site Cleanup

ec: Trevor Beauregard, Executive Director, Gardner Redevelopment Authority
Maribel Cruz, Economic Development Coordinator, Gardner Redevelopment Authority
Michael LeBlanc, Brownfields Coordinator, DEP-CERO

SIGN-IN

MEETING: 140 S. Main St. Brownfield Cleanup Grant Proposal

DATE & PLACE: Thursday January 3rd 6:00 p.m., 115 Pleasant St. City Hall Annex Rob Hubbard Conference Room Gardner, MA 01440 @ 6:00p.m.

[illegible]

More funds sought for site cleanup

Former site of Bolster Oil at 140 South Main St. still contaminated

By Andrew Mansfield
Gardner News Reporter

GARDNER — The Gardner Redevelopment Authority is seeking additional grant funding for environmental cleanup of the property at 140 South Main St.

Decades ago the property was home to Bolster Oil Co., believed to be the source of the petroleum contaminating the soil. Testing in recent years revealed the pollution.

About \$400,000 has been awarded from federal and state sources for redevelopment efforts at the brownfield site, but ended up not being enough to fully bring the site up to environmental standards.

"When you clean up a site like this, there are a lot of unknowns," Gardner Redevelopment Authority Executive Director Trevor Beauregard said. "We did what we could do at the time under the circumstances. A lot of these types of sites you just never know."

Beauregard also serves as the city's planning director. The Redevelopment Authority is an economic development agency that works on behalf of the city's interests.

According to an analysis prepared for the city, the site at 140 South Main St. is a 0.22-acre property with two single-story buildings consisting of multi-room office space with an attached garage.

It is abutted by Greenwood Brook to the south and a residential property off Travers Street to the west. An about 13-foot-high retaining wall is on the southeastern part of the property, separating the site from the brook.

From the 1930s to the 1980s, the site was home to Bolster Oil Co., which reportedly distributed petroleum products such as gasoline, fuel oil, kerosene and lubricating oil. The company also



The Gardner Redevelopment Authority is seeking additional grant funding for environmental cleanup of 140 South Main St., which was home to Bolster Oil Co. from the 1930s to the 1980s. The goal is to ultimately sell the property for commercial use. (GARDNER NEWS STAFF/ ANDREW MANSFIELD)

used the property for automotive repair and servicing.

In 1986, 11 underground storage tanks and an undisclosed number of above-ground storage tanks associated with Bolster were removed from the site.

The site at 140 South Main St. was also reportedly home to a few other businesses following Bolster, including Mailman's Steam Cleaning in the 1990s, which only used the property for office and storage space for equipment.

An automotive repair garage occupied the site from the early 2000s until 2010.

Beauregard explained that the city took over the property through the tax title process and the Gardner Redevelopment Authority then took ownership.

He said that previous environmental cleanup of the site concluded about two years ago, and included excavating contaminated soil and filling the site back in. The process was overseen by engineering firm Weston & Sampson.

Follow-up testing of samples from groundwater monitoring wells was

required, which Beauregard said takes time.

"As we tested we found one of the monitoring wells closest to the wall, closest to the brook, was still above DEP (Massachusetts Department of Environmental Protection) standards," he said.

That means the Redevelopment Authority still can't sell the site, which has prompted the effort to acquire more grant funding this year.

Through the MassDevelopment Brownfield Redevelopment Fund, the Gardner Redevelopment Authority is seeking a grant of up to \$350,000, a combination of assessment and cleanup funds, according to Beauregard.

The city's economic development coordinator, Maribel Cruz, has worked on the grant application and said the state will announce grant awards in the early spring.

Beauregard said a federal Environmental Protection Agency cleanup grant of up to \$200,000 is also being sought. That money, if it is awarded, would not be

announced until later in the year.

The project goal is to remove the retaining wall and conduct additional contaminated soil excavation at depths near and below the groundwater table, according to the analysis prepared for the city.

For the state grant, if site remediation leads to revenue through the sale of the property and new tax growth, there is a provision for the grant to be repaid over a 30-year period, either in whole or in part.

Beauregard said the Redevelopment Authority would likely not make much from selling the property, citing the amount a new owner would have to be willing to invest to renovate the buildings.

He said the "main goal" is to get the property back on the tax rolls and create new jobs.

"Basically we want to close it out so we can actually sell the property," he said. "It's always been a small business. I think it would be a good site for a small business."

Application for Federal Assistance SF-424

* 1. Type of Submission:

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

* 2. Type of Application:

- ☒ New
☐ Continuation
☐ Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

01/31/2019

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

01/31/2019

7. State Application Identifier:

MASSACHUSETTS

8. APPLICANT INFORMATION:

* a. Legal Name:

GARDNER REDEVELOPMENT AUTHORITY

* b. Employer/Taxpayer Identification Number (EIN/TIN):

043013706

* c. Organizational DUNS:

0802932620000

d. Address:

* Street1:

115 PLEASANT ST

Street2:

ROOM 202

* City:

GARDNER

County/Parish:

Worcester

* State:

MA: Massachusetts

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

014409998

e. Organizational Unit:

Department Name:

Gardner Redevelopment Authorit

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

* First Name:

Maribel

Middle Name:

* Last Name:

Cruz

Suffix:

Title:

Economic Development Coordinator

Organizational Affiliation:

City of Gardner

* Telephone Number:

9786304074

Fax Number:

* Email:

mcruz@gardner-ma.gov

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

* 12. Funding Opportunity Number:

EPA-OLEM-OBLR-18-07

* Title:

FY19 GUIDELINES FOR BROWNFIELDS CLEANUP GRANTS

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

140 South Main Street Gardner, Ma Petroleum Contaminated Site

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:*** a. Applicant * b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:* a. Start Date: * b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="200,000.00"/>
* b. Applicant	<input type="text" value="10,000.00"/>
* c. State	<input type="text" value="10,000.00"/>
* d. Local	<input type="text" value="10,000.00"/>
* e. Other	<input type="text" value="5,000.00"/>
* f. Program Income	<input type="text" value="10,000.00"/>
* g. TOTAL	<input type="text" value="245,000.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☒ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☐ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title: * Telephone Number: Fax Number: * Email: * Signature of Authorized Representative: * Date Signed: